



## **Bristol City Council Statement of Case**

**Application Ref:** 25/11876/PINS

**Site Address:** 7 Belvedere Road, Bristol, BS6 7JG

**Proposal:** Change of use from three residential flats (use class C3) to a 12 bedroom extension to an existing nursing home (use class C2), including demolition and replacement of rear extension and external alterations.

### **Site and Surroundings**

No. 7 Belvedere Road is a three-storey end-of-terrace property constructed of pennant stone and render, with some brick detailing. It features a prominent double-height bay window on the front elevation and a modest single-storey rear extension at ground floor level. The property is set behind a paved forecourt enclosed by a low stone wall. This forecourt provides stepped access to the main entrance at ground floor level and to the lower ground floor.

The building is currently in residential use (Use Class C3) and comprises three flats:

A five-bedroom maisonette across the lower ground and ground floors, which benefits from access to an enclosed, largely gravelled rear garden containing three mature trees, a greenhouse, and some small domestic planting. Two two-bedroom flats located at first and second floor levels. Access to the building is via a small front door on Belvedere Road and a single-storey porch located on the western side elevation.

### **Character of the Area**

Belvedere Road is a two-way residential street lined on both sides with large, late-Victorian townhouses, many of which have been subdivided into maisonettes or flats. Historic maps suggest No. 7 was constructed around 1900. The property is located on the outer edge of the Cotham North Residents' Parking Scheme, and the street provides unallocated on-street parking for much of its length, interrupted by driveways, dropped kerbs, and a small number of disabled parking bays. Nearby streets are similarly arranged, though some include residents-only permit spaces.

The site lies within the Downs Conservation Area. The surrounding area is predominantly residential in character but includes a concentration of care facilities and schools. Directly adjoining the site to the east are Nos. 8–9 Belvedere Road, which form the 40-bedroom Glenview Nursing Home specialising in dementia care. To the west, the property is separated from No. 6 Belvedere Road by a narrow alleyway, with further large Victorian villas continuing along the road. Opposite the site, to the north, is a pair of brick-built infill dwellings.

Further west along Belvedere Road, additional care facilities include:

‘Meadowcare’ at Nos. 2–3 Belvedere Road (34 bedrooms),

‘Belvedere Lodge’ at No. 1 (20 bedrooms).

Westbury Park School and further care homes are also located nearby on Westbury Park, The Glen, and Redland Road.

### **Application History**

Previous relevant applications include as follows:

17/04752/F, Change of use from 3 x flats to a 17 x bed extension to the nursing home at 8-9 Belvedere Road. External alterations to building including rear extension and side and rear dormer roof extension. 2 November 2017, WITH

19/03104/F, Change of use from 3 x flats to a 17 x bed extension to the nursing home at 8-9 Belvedere Road. 2 June 2020 ,REF

20/06030/F, Proposed change of use from 3 No. residential flats to provide 14 No. additional Bed spaces to Glenview Nursing Home at 8-9 Belvedere Road, Bristol. 17 June 2021, REF

21/00415/F, Conversion of 3no. flats into 8no. flats with the creation of a part 3-storey, part 2-storey and part single storey, rear extension. 10 May 2021, REF

22/01529/F, Change of use from 3no. 2-bed flats (Class C3) to a 12-bed extension to the nursing home at 8-9 Belvedere Road (Class C2) (Revised proposal). 30 January 2023 ,AAND

24/03733/F, Replacement rear extension and works to existing building to include external alterations to window levels, new dormers to rear and side, formation of windows to lower ground floor level and creation of associated lightwells. 4 December 2024 ,PG

The appeal site has been the subject of previous proposals for additional bed spaces. These include an application for a 17-bed extension, refused by the LPA in June 2020 and later dismissed on appeal on parking grounds. A subsequent application was made for a smaller, 14-bed extension, which was also refused by the Council for similar reasons. Later, the proposal was further reduced, being for a 12-bed extension which was dismissed on appeal on 30th January 2023.

The application represents a resubmission of planning application Ref. 22/01529/F, which was dismissed at appeal in January 2023 (PINS Ref. APP/Z0116/W/22/3299847). The appellant now seeks reconsideration on the basis of what is described as “updated highways evidence,” including recent on-street car-parking-stress surveys, which they contend amount to a “significant change in material circumstances” and address the Inspector’s previous reasons for dismissal relating to parking pressure and highway safety. Accordingly, I have assessed the new Transport Statement in the context of the evidence and findings from all preceding applications and appeal decisions.

### **Main Issue:**

The primary issue addressed in this report is transport and highway safety. This section specifically responds to the assertions made in the updated Transport Statement (HTp/2330/TS/01, March 2025), submitted in support of the appeal proposal. Particular attention is given to the ongoing concerns regarding on-street parking pressure and the resulting implications for highway safety.

The application site has no off-street car parking provision and no existing secure cycle parking provision. The existing Glenview Care Home does not have off-street car parking provision, and none is proposed to be provided by the application proposals. The existing care home has no secure cycle parking, and two Sheffield type stands are proposed to the front of the application site, within the red line boundary, providing secure short stay cycle parking for up to four visitor cycles, together with a cycle store in the garden of number 7 Belvedere Road providing secure and covered parking for up to four staff cycles.

The Transport statement provided by the applicant is claiming the proposal will not require any new staff (para. 1.3), so no new parking demand will arise. However, the officer found this assumption is fundamentally flawed. While the total number of staff may remain unchanged, there is no guarantee that shift overlaps, or support needs will not increase due to the larger number of residents. Even without new hires, the proposal would increase the overall activity on site, resulting in more visitors, consultants, cleaners, delivery drivers, and support staff.

The staff travel habit tables in the applicant's report confirm that:

- 4–6 staff currently drive and park on-street each day (Table 4.10).
- Most of these staff park on unrestricted roads already experiencing high demand (para. 3.7).

The extension will generate additional cumulative impacts. This is contrary to Policy DM23, which states that proposals must not cause or exacerbate traffic congestion, and Policy BCS10, which requires development to ensure highway safety and efficient movement.

The Transport Statement also stated that Converting 3 flats (assumed 3 cars) to care home use will “free up” 3 on-street parking spaces. While this statement is not supported by any verifiable data, there is no guarantee:

- That each flat is associated with a car.
- That any current parking space will be “freed” or available for new users.
- That the reduction offsets the increased intensity of use from 12 additional residents and associated activities.

Importantly, the Planning Inspector previously noted (para. 6) that even if three spaces were released, they would not offset the impact of four to five additional parked vehicles, particularly during peak staff changeovers.

Therefore, the logic is unsubstantiated and does not demonstrate compliance with DM23, which requires parking impacts to be properly managed and mitigated.

Additionally, it is stated that the site is highly accessible by bus and cycle, reducing reliance on car travel (para. 3.36). While the location is indeed within an accessible area, the data collected by the applicant undermines their own argument:

- Most visitors (3–4 per day) arrive by car (Table 4.12), staying up to an hour (Table 4.11).
- Even with public transport options, 4–6 staff park on-street daily, with some staying overnight.
- Real-world behaviour consistently favours car use over sustainable modes.

Sustainable location does not negate the need to accommodate realistic parking demand. The proposal offers zero off-street parking, despite known local constraints. The proposal fails to

meet the requirements of Policy DM23, which requires appropriate parking provision relative to context, and BCS10, which seeks to minimise vehicle-related impacts even in sustainable locations.

On-street surveys show availability of parking spaces and a “negligible” net impact (para. 1.11).

However, this is contradicted by both the Inspector’s observations and the Council’s ongoing evidence:

- Inspector found that local parking was “consistently above 90%” and often “oversubscribed at over 100%.”
- Observations confirmed vehicles parked across driveways and on dropped kerbs, increasing conflict with pedestrians.
- Appellant’s own surveys admit demand is highest during weekday daytime—when staff and visitors will be present.

Any additional parking stress is unacceptable in this context, particularly when cumulative. The loss of 4–5 spaces to proposed loading bays (para. 11) further reduces capacity.

There is no realistic surplus of space. The proposal is contrary to DM23, which specifically prohibits schemes where on-street parking cannot be reasonably accommodated.

The statement also claimed that the Delivery & Servicing Plan (SMP) and use of loading bays will prevent harm (para. 12).

The SMP is unlikely to be enforceable or effective:

- It permits deliveries from 8am onwards, which is already a peak time for local parking.
- Care home has limited control over external suppliers (e.g. Ambulances, Amazon, medical deliveries).
- As the Inspector noted (para. 13) in the previous appeal, staff cannot meaningfully control the behaviour of third-party drivers.

Furthermore:

- TROs for the proposed loading bays are not guaranteed.
- Even if secured, the bays would displace up to 5 existing public spaces (para. 11), pushing cars into surrounding streets.

The delivery plan does not remove harm. It fails to comply with Policy BCS10 (safe and efficient transport system) and Policy DM23 (ensuring that servicing arrangements do not worsen congestion or highway risk).

The proposal does not address the fundamental concerns identified in the previous appeal. It remains contrary to local and national planning policies, and the Transport Statement fails to demonstrate that the scheme will avoid harm to local parking capacity or highway safety.

There is no new evidence or mitigation sufficient to overcome the Inspector’s previous conclusions. The impact on the surrounding highway network would be material, cumulative, and unacceptable.

## **Transport Development Management (TDM) Consultation**

TDM was previously consulted on the 2022 planning application (Ref. 22/01529/F), which proposed the same change of use now under appeal. In their formal response dated 23 May 2022, TDM recommended refusal of the application, concluding that the development would result in an unacceptable intensification of on-street parking and lead to harm to highway safety, particularly given the lack of any off-street parking and the premium demand for parking in the area.

Their concerns specifically aligned with those raised by the Planning Inspector in the earlier appeal decision (APP/Z0116/W/20/3263935), where the Inspector cited the dangerous nature of vehicles being forced to park in the middle of the road, creating congestion, conflict, and hazards due to two-way traffic movements. TDM also noted that while the introduction of loading bays might partially address some servicing concerns, this would not mitigate the wider and more consistent problem of parking stress, particularly outside operational hours.

The TDM response concluded that the proposal conflicted with Policy DM23 of the Site Allocations and Development Management Policies, Policy BCS10 of the Bristol Core Strategy, and the National Planning Policy Framework (Chapter 9 – Promoting Sustainable Transport).

Given that there have been no material changes to either the development proposal or the relevant planning policies since the 2022 refusal, and there has been no demonstrable improvement in local highway conditions, the previous TDM response remains applicable and relevant. As such, it is not considered necessary to seek further consultation from TDM in the context of this appeal.

## **Wider Planning Context and Additional Grounds for Refusal**

### **- Loss of Family Housing and Local Housing Imbalance**

Policy BCS18 requires new development to maintain a balanced housing mix in communities. The earlier application for 8 flats at the site highlighted that the surrounding Manor Park LSOA already includes 80% flats, with a disproportionately low number of family-sized homes.

The continued intensification of institutional (C2) care home use would:

- Further reduce opportunities for family housing,
- Undermine the objective of creating mixed, inclusive communities,
- Contribute to a creeping overconcentration of institutional and flat-style housing on this street.

The 2021 Officer Report noted:

“There is an overconcentration of flats within the Manor Park LSOA... The proposed development would not result in the loss of family houses... [but] the mix of dwelling sizes in the area is already skewed.”

In terms of Policy DM2, this further supports concern that the cumulative impact of shared or institutional housing is harming community balance.

In addition, Policy BCS18 of the Bristol Core Strategy requires all new residential development to contribute to a mix of housing tenures, types and sizes to support mixed, balanced and inclusive

communities. Developments should address affordable housing need and local demand, enhance diversity in the housing stock, respond to demographic changes, and employ imaginative design. They must also provide sufficient internal space to allow for flexible and adaptable living.

Given the presence of three existing care homes on Belvedere Road, the previous reason for refusal set out under application 19/03104/F remains applicable. The proposed development would lead to an overconcentration of residential institutions on the street, resulting in harm to the mix, balance, and inclusivity of the local community. This would be contrary to Policy BCS18 (Housing Type), which seeks to ensure a diverse and inclusive housing mix. Furthermore, the proposal would reduce the overall choice of homes in the area by altering the housing mix, in conflict with Policy DM2 (Residential Sub-divisions, Shared and Specialist Housing).

### **Conclusion and Recommendation**

Despite revised supporting documents, the scheme fails to address the fundamental reasons for previous refusals and appeal dismissals. The updated Transport Statement confirms—rather than rebuts—that the development would result in:

Increased vehicle demand in an area with no remaining on-street capacity,

Loss of 4–5 parking spaces through the creation of uncertain and unenforceable loading bays,

No effective control over the number or timing of deliveries and visitor vehicle movements,

Continued high reliance on on-street parking by staff and visitors, without any meaningful mitigation,

Ongoing safety concerns for pedestrians and residents, particularly those with limited mobility or reliance on clear access routes.

Furthermore, there have been no changes to the substance of the proposed development when compared with the previously refused application, and no improvements to the existing parking or highways situation on Belvedere Road. The local conditions remain constrained, with parking demand regularly exceeding available supply, and the proposal would serve only to intensify this pressure.

The application remains clearly contrary to:

Policy DM23 (transport development management),

Policy DM2 (impact of shared and specialist housing),

Policy BCS10 (transport and access),

and Paragraph 111 of the National Planning Policy Framework, which states that development should be refused where there would be an unacceptable impact on highway safety or the residual cumulative impacts are severe.

Accordingly, the Local Planning Authority respectfully requests that the appeal be dismissed.

Sincerely,

Development Management